

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:	§	Case No. 22-60043
	§	
FREE SPEECH SYSTEMS, LLC,	§	Chapter 11 (Subchapter V)
	§	
Debtor.	§	

**EXHIBIT C**

June 24, 2021

NO. X06-UWY-CV-18-6046436S	)	SUPERIOR COURT
	)	
ERICA LAFFERTY, ET AL,	)	COMPLEX LITIGATION DOCKET
	)	
VS.	)	AT WATERBURY
	)	
ALEX EMRIC JONES, ET AL,	)	JUNE 24, 2021
	)	
_____	)	
	)	
NO. X-06- UWY-CV18-6046437-S	)	SUPERIOR COURT
	)	
WILLIAM SHERLACH,	)	COMPLEX LITIGATION DOCKET
	)	
VS.	)	AT WATERBURY
	)	
ALEX EMRIC JONES, ET AL.	)	JUNE 24, 2021
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VS.	)	AT WATERBURY
	)	
ALEX EMRIC JONES, ET AL.	)	JUNE 24, 2021

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CONFIDENTIAL

ORAL AND VIDEOTAPED DEPOSITION OF  
 FREE SPEECH SYSTEMS, LLC  
 BY  
 MICHAEL ZIMMERMANN  
 JUNE 24, 2021

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ORAL AND VIDEOTAPED DEPOSITION OF MICHAEL ZIMMERMANN,  
 produced as a witness at the instance of the PLAINTIFF, and  
 duly sworn, was taken in the above-styled and -numbered cause  
 on JUNE 24, 2021, from 9:00 a.m. to 4:10 p.m., before

June 24, 2021

1 Rosalind Dennis, Notary in and for the State of Texas, reported  
2 by machine shorthand, appearing remotely from Dallas, Texas,  
3 pursuant to the Federal Rules of Civil Procedure and the  
4 provisions stated on the record or attached hereto.

June 24, 2021

A P P E A R A N C E S

FOR THE PLAINTIFFS:

CHRISTOPHER M. MATTEI, ESQ.  
MATTHEW S. BLUMENTHAL, ESQ.  
KOSKOFF KOSKOFF & BIEDER, PC  
350 Fairfield Avenue, Suite 501  
Bridgeport, Connecticut 06604  
Cmattei@koskoff.com  
mblumenthal@koskoff.com  
(203) 336-4421

FOR THE DEFENDANTS:

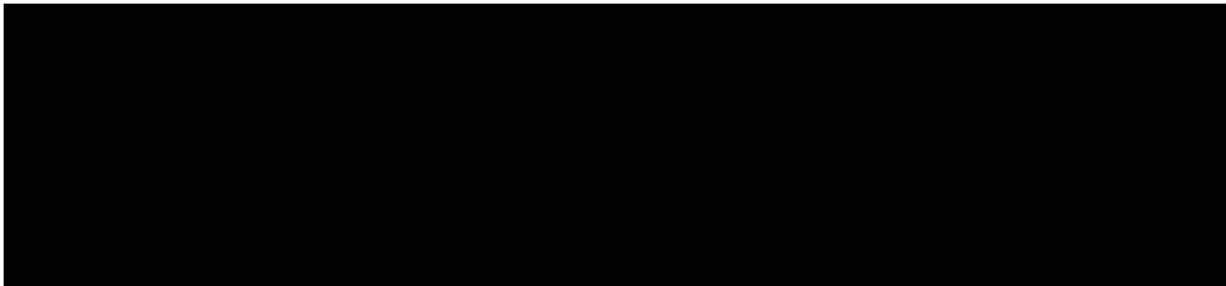
JAY MARSHALL WOLMAN, ESQ.  
RANDAZZA LEGAL GROUP  
100 Pearl Street  
14th Floor  
Hartford, Connecticut 06103  
jmw@randazza.com  
(702) 420-2001

ALSO PRESENT:

Joel Raguso - Videographer

June 24, 2021

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Q. Okay. Moving forward to the next episode of preparation, you believe that was earlier this week on Monday or Tuesday at Free Speech Systems offices?

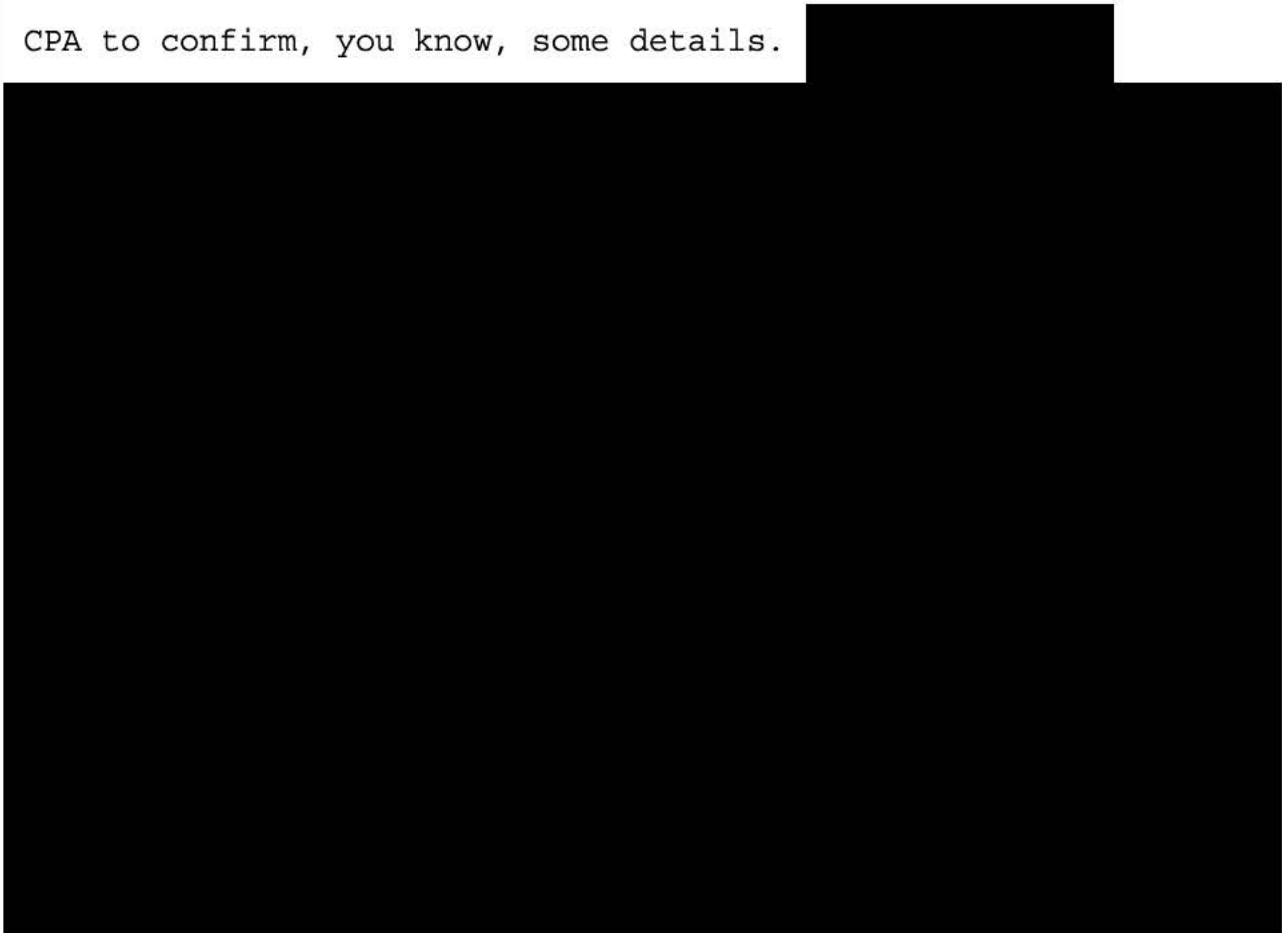
A. That is correct.

Q. Okay. And that was about an hour?

A. That's correct.

Q. Who participated in that prep session?

A. I spoke to Bill Love on the phone who's the -- the CPA to confirm, you know, some details.



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1 Did -- you said that you also asked -- well,  
2 did -- did Mr. Love provide you any other information about  
3 Free Speech Systems's relationships with any other corporate  
4 entities?

5 A. I believe we discussed PQPR.

6 Q. Okay. And what did tell you about PQPR's  
7 relationship with Free Speech Systems?

8 A. Right. Well, it's my understanding PQPR is a comp-  
9 -- company that develops and prepares supplement products for  
10 Free Speech Systems to then retail through its e-commerce  
11 platform.

12 Q. And did he describe for you any contractual  
13 relationship between PQPR and Free Speech Systems?

14 A. He didn't.

15 Q. Okay. Did he tell you who has the controlling  
16 ownership of PQPR?

17 MR. WOLMAN: Objection.

18 A. He didn't.

19 Q. I'm sorry?

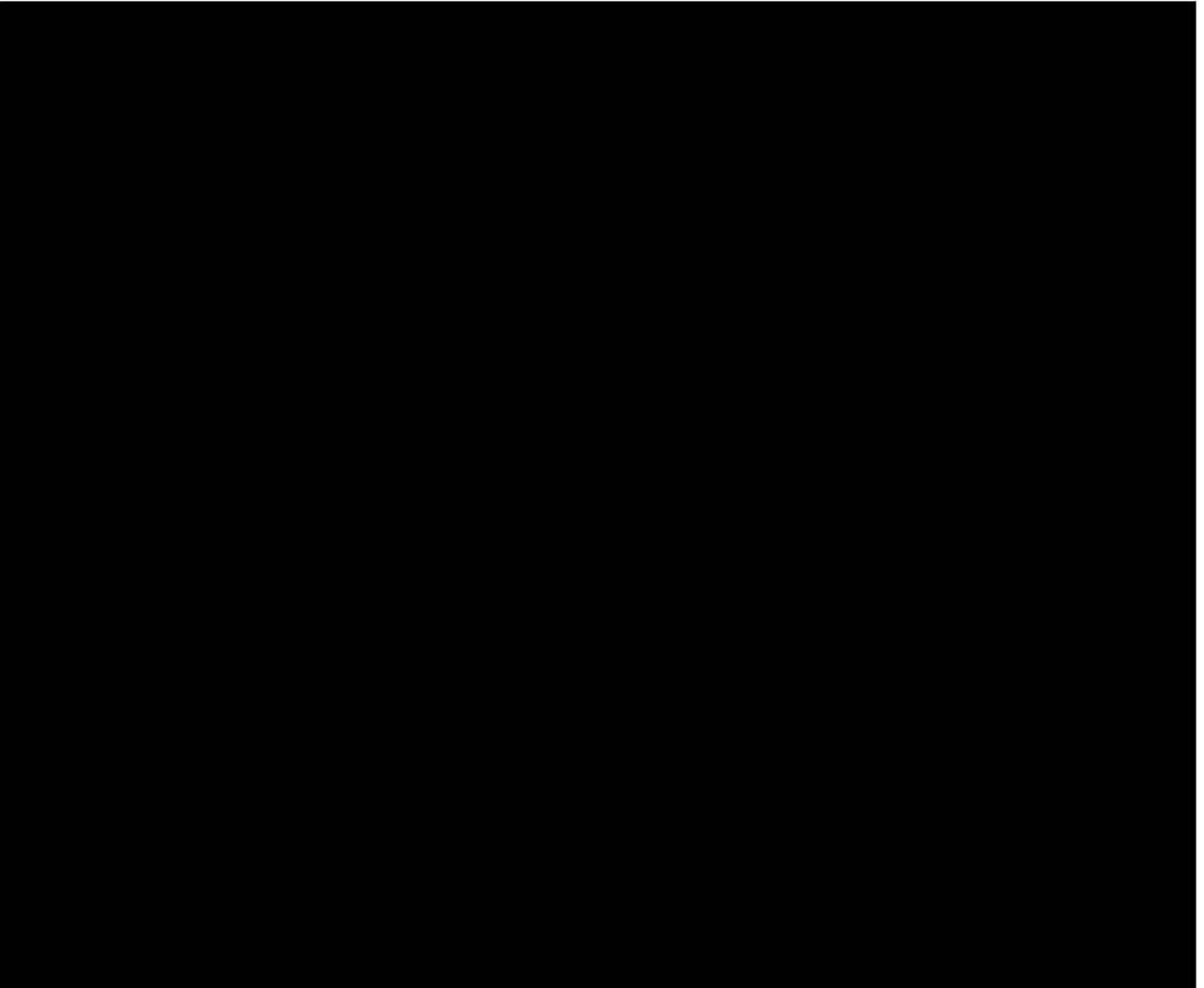
20 A. He did not.



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1 Q. But the only information you have is that from  
2 Alex Jones and that's what you've described, right?

3 A. That's correct.



19 Q. (BY MR. MATTIE) And then, you said that you also  
20 asked him about Free Speech Systems's business relationship  
21 with PQPR, correct?

22 A. That's correct.

23 Q. And what did he advise you about that?

24 A. He indicated to me that PQPR is a company that  
25 basically develops and procures supplements that are then sold



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1 on the Infowars store by Free Speech Systems.

2 Q. Okay. And did he say anything about who owns PQPR?

3 A. We did not discuss that.

4 Q. Okay. Does -- who -- who does own PQPR?

5 A. It's owned by two other LLCs.

6 Q. What are they?

7 A. What are they?

8 Q. Huh-uh.

9 A. I don't have the names in front of me right now.

10 Q. Okay. So I understand that, sir, but what -- you are  
11 testifying as Free Speech Systems.

12 So as you sit here today as Free Speech Systems,  
13 I understand that your testimony is that Free Speech Systems is  
14 unaware of the two corporate entities that have an ownership  
15 interest in PQPR, correct?

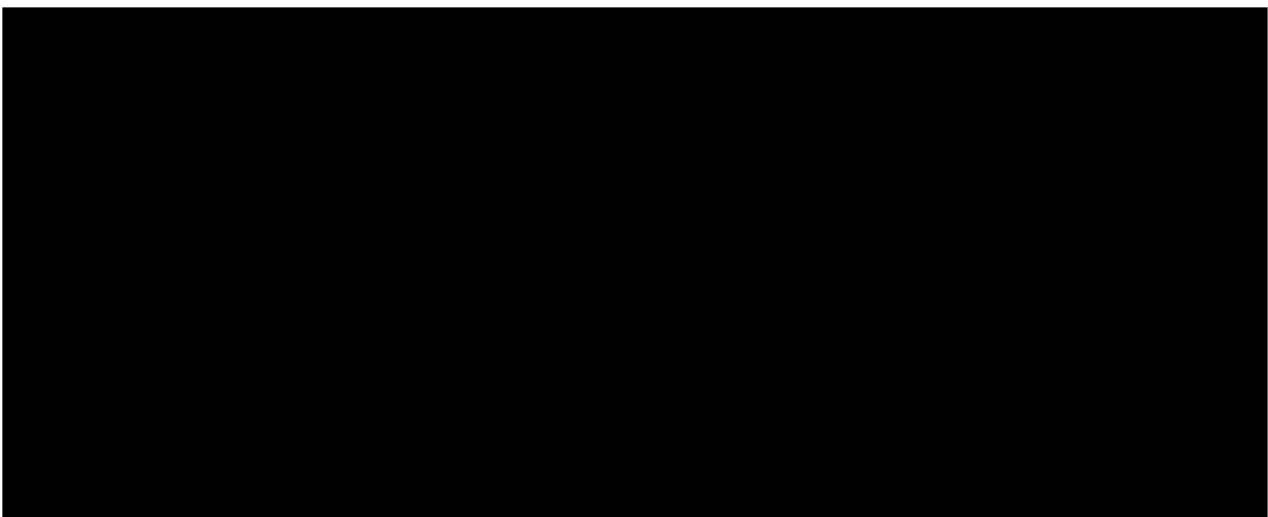
16 MR. WOLMAN: Objection. That's beyond the scope  
17 of Number 3.

18 A. Free Speech Systems has knowledge of PQPR and its  
19 business relationship, but not the management or structure of  
20 PQPR.



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Q. Okay. Since 2012, has Free Speech System taken on any debt?

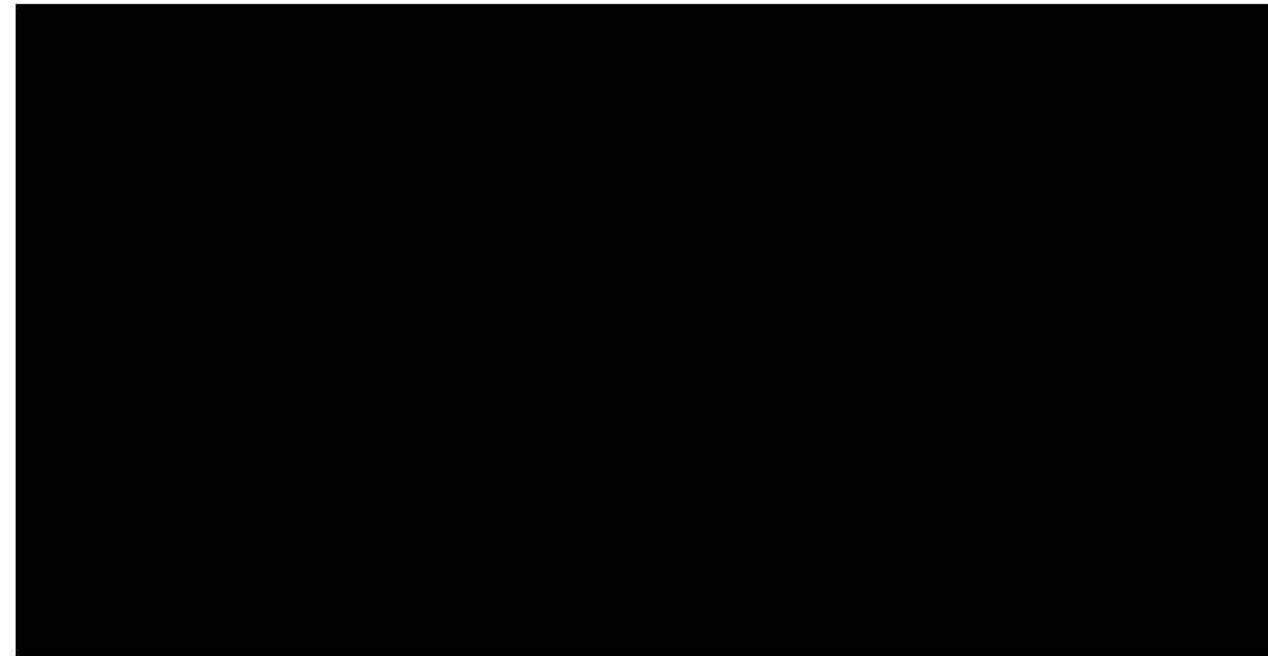
A. I can't testify to that today. It keeps financial records.

Q. Okay. So Free Speech Systems is unaware whether it has taken on any debt since 2012, correct?

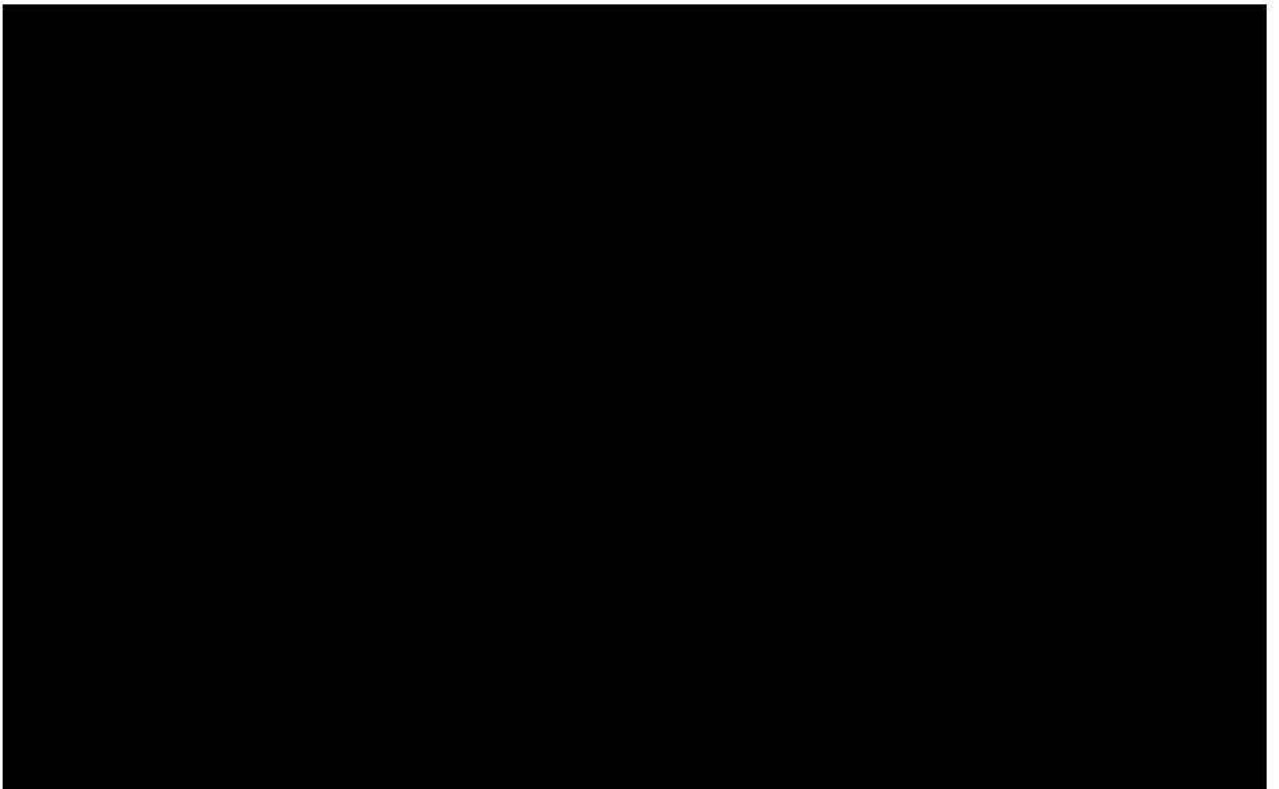
MR. WOLMAN: Objection.

Q. (BY MR. MATTIE) Correct?

A. Correct.



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BY MR. MATTEI:

Q. Mr. Zimmermann, did anybody provide you with any information during the break?

A. No.

Q. Okay. All right. So, Mr. Zimmermann Free Speech Systems is owned and operated by Alex Jones, correct?

A. That's correct.

Q. And does he have authority over all Free Speech Systems operations?

A. That's correct.

Q. Okay. He is the CEO and owner?

A. That's correct.

Q. And does he have the authority to hire and fire

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1 anybody of his choosing?

2 A. That's correct.

3 Q. And does he have authority to overrule any decision  
4 made by a subordinate?

5 A. That's correct.

6 Q. And he has ultimate authority over Free Speech  
7 finances?

8 A. That's correct.

9 Q. And he is not accountable to a board of directors or  
10 any governing authority, correct?

11 A. Correct.

12 Q. When did Free Speech Systems hire its first employee?

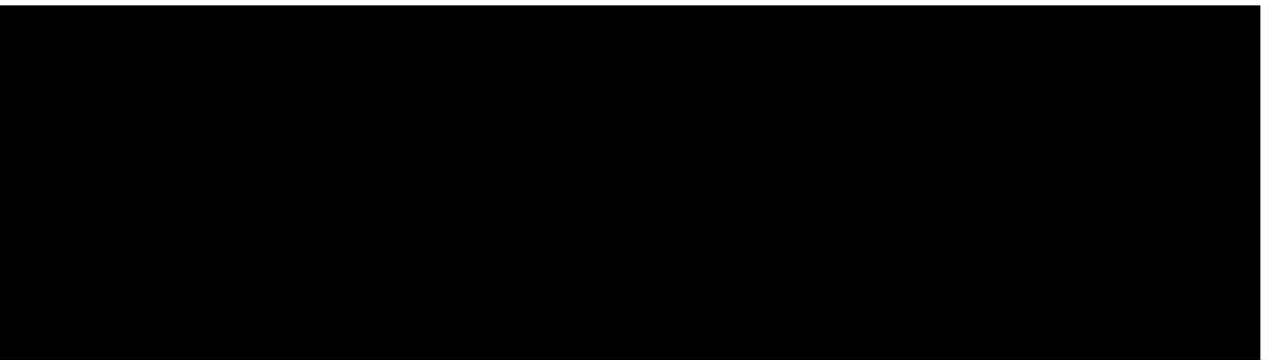
13 A. The company maintains records. I don't have  
14 information on that with me today?

15 Q. Can Free Speech Systems approximate the year that it  
16 first hired an employee?

17 A. Approximately 2007, 2008.

18 Q. How many people are employed by Free Speech Systems  
19 presently?

20 A. Presently, approximately 80.



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## REPORTER'S CERTIFICATION

DEPOSITION OF MICHAEL ZIMMERMANN

JUNE 24, 2021

19 I, Rosalind Dennis, Notary in and for the State of Texas,  
 20 hereby certify to the following:

21 That the witness, MICHAEL ZIMMERMANN, was duly sworn by  
 22 the officer and that the transcript of the oral deposition is a  
 23 true record of the testimony given by the witness;

24 That the original deposition was delivered to Mr. Mattei.

25 That the amount of time used by each party at the

June 24, 2021

1 deposition is as follows:

2 MR. MATTEI .....05 HOUR(S): 23 MINUTE(S)

3 MR. WOLMAN .....00 HOUR(S): 26 MINUTE(S)

4 That pursuant to information given to the deposition  
5 officer at the time said testimony was taken, the following  
6 includes counsel for all parties of record:

7 Mr. Mattei Attorney for the Plaintiff.

8 Mr. Wolman Attorney for the Defendant.

9 I further certify that I am neither counsel for, related  
10 to, nor employed by any of the parties or attorneys in the  
11 action in which this proceeding was taken, and further that I  
12 am not financially or otherwise interested in the outcome of  
13 the action.

14 Certified to by me this 12th day of July, 2021.

15  
16 

17 ROSALIND DENNIS

18 Notary in and for the  
19 State of Texas

20 Notary: 129704774

21 My Commission Expires: 10/8/2022

22 US LEGAL SUPPORT

23 8144 Walnut Hill Lane

24 Suite 120

25 Dallas, Texas 75231

214-741-6001

214-741-6821 (FAX)

Firm Registration No. 343